

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA**

JEANNE BENNETT, Administrator)
of the Estate of Michael Manos,)
Deceased,)

Plaintiff,)

Case No.: 17-CV-289-SPS

vs.)

CARTER COUNTY BOARD OF)
COUNTY COMMISSIONERS, et al.,)

Defendants.)

PLAINTIFF'S PRELIMINARY WITNESS LIST

COMES NOW the Plaintiff, Jeanne Bennett ("Plaintiff"), as Administrator of the Estate of Michael Manos ("Mr. Manos" or "Decedent"), deceased, and respectfully submits her Preliminary Witness List, as follows:

No.	Name	Subject of Information
1.	Jeanne Bennett c/o Daniel Smolen Smolen Smolen & Roytman, PLLC 701 S. Cincinnati Ave. Tulsa, OK 74119	Facts and circumstances relevant to allegations contained in the Complaint, administration of the Estate and identification of documents.
2.	Sherriff Chris Bryant c/o Ambre C. Gooch Collins Zorn & Wagner, PC 429 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815 Phone: (405) 524-2070	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Carter County Detention Center ("Jail").
3.	Former Sherriff Milton Anthony c/o Robert Lafferrandre Pierce Couch Hendrickson Baysinger & Green, L.L.P. 1109 N. Francis Oklahoma City, OK 73106	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Jail.
4.	Deputy Corbin Whitener c/o Ambre C. Gooch	Facts and circumstances relevant to allegations contained in the Complaint. Policies,

	Collins Zorn & Wagner, PC 429 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815 Phone: (405) 524-2070	procedures, and practices in place at the Jail. Treatment and care provided to Mr. Manos in the Jail.
5.	Deputy Josh Adams c/o Robert Lafferrandre Pierce Couch Hendrickson Baysinger & Green, L.L.P. 1109 N. Francis Oklahoma City, OK 73106	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Jail. Treatment and care provided to Mr. Manos in the Jail.
6.	Deputy Troy Brantley Maxson c/o James. L. Gibbs, II Goolsby Proctor Heefner & Gibbs, PC 701 N Broadway, Ste 400 Oklahoma City, OK 73102 (405) 524-2400	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Jail. Treatment and care provided to Mr. Manos in the Jail.
7.	Deputy Richard Ayers c/o Ambre C. Gooch Collins Zorn & Wagner, PC 429 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815 Phone: (405) 524-2070	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Jail. Treatment and care provided to Mr. Manos in the Jail.
8.	Deputy Ryan Collier c/o Robert Lafferrandre Pierce Couch Hendrickson Baysinger & Green, L.L.P. 1109 N. Francis Oklahoma City, OK 73106	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Jail. Treatment and care provided to Mr. Manos in the Jail.
9.	Deputy Barbara Garrison c/o Ambre C. Gooch Collins Zorn & Wagner, PC 429 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815 Phone: (405) 524-2070	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Jail. Treatment and care provided to Mr. Manos in the Jail.
10.	Deputy Jeremy Ham c/o James. L. Gibbs, II Goolsby Proctor Heefner & Gibbs, pc 701 N Broadway, Ste 400 Oklahoma City, OK 73102 (405) 524-2400	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Jail. Treatment and care provided to Mr. Manos in the Jail.
11.	Deputy Chester Carter c/o Ambre C. Gooch Collins Zorn & Wagner, PC	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Jail.

	429 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815 Phone: (405) 524-2070	Treatment and care provided to Mr. Manos in the Jail.
12.	Deputy Jesse McDaniels c/o Ambre C. Gooch Collins Zorn & Wagner, PC 429 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815 Phone: (405) 524-2070	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Jail. Treatment and care provided to Mr. Manos in the Jail.
13.	Carter County Board of County Commissioners c/o Ambre C. Gooch Collins Zorn & Wagner, PC 429 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815 Phone: (405) 524-2070	Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Jail.
14.	Keelan Allison c/o Ambre C. Gooch Collins Zorn & Wagner, PC 429 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815 Phone: (405) 524-2070	CCSO employee who booked Mr. Manos in to the Carter County Detention Center (“Jail”) on 10/22/2015. Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Jail. Treatment and care provided to Mr. Manos in the Jail.
15.	Dr. Harold N. Claver Last known contact info: Mercy Memorial Hospital	Dr. Claver was assigned as Mr. Manos’ Attending Physican at Mercy Memorial Hospital (“Hospital”) on the night of Mr. Manos’ death.
16.	Adam Lumer Last known contact info: Soutern Oklahoma Ambulance Service (SOAS)	Deposed. Mr. Lumer is expected to give fact testimony consistent with his deposition. In addition, Lumer may be called to give opinion testimony concerning CPR and standards for the emergency transport of patients with acute, obvious and serious mental health care needs.
17.	Wesley Hargis Last known contact info: SOAS	Mr. Lumer is one of the two Emergency Medical Technicians who attempted to resuscitate Mr. Manos and who transported him from the Jail to the Hospital.
18.	Anthony J. Kirksey Last known contact info: Oklahoma City VAMC	Mr. Kirksey is a Licensed Clinical Social Worker who, while employed by the Oklahoma City Veteran Affairs Medical Center, spoke with Plaintiff concerning the Jail’s refusing to provide Mr. Manos with his necessary medication and refusing to accept

		the necessary medication that she attempted to provide the Jail with.
19.	Tiffel Dickinson, RN Last known contact info: Mercy Memorial Hospital	Nurse Dickinson performed Triage on Mr. Manos at the Hospital on the night of Mr. Manos' death.
20.	Carol E. Craig, RN Last known contact info: Mercy Memorial Hospital	Nurse Craig was the House Supervisor notified of Mr. Manos' death at the Hospital. She performed the Expirations Checklist regarding Mr. Manos' death.
21.	Justin Brown OSBI 607 SW E Avenue Lawton, Oklahoma 73507 Phone: (580) 291-8127	Agent who assisted in OSBI investigation. Would be expected to testify as to OSBI's investigation, and, if necessary, the authenticity of the OBSI Report and attachments.
22.	Dr. Mark Harrison Last known contact info: Office of the Chief Medical Examiner Central Office 901 S. Stonewall Oklahoma City, OK 73117	Dr. Harrison was the Medical Examiner who performed the autopsy of Mr. Manos' body and wrote the subsequent autopsy report.
23.	Todd R. Wilcox, MD 4760 South Highland Drive, #105 Salt Lake City, Utah 84117	Expert witness. <i>See</i> Report.
24.	Michael Crawford 1109 N. Francis, Oklahoma City, OK 73106	Mr. Crawford is expected to testify at trial consistent with his deposition testimony.
25.	Randee Quinlan Southern Oklahoma Ambulance Service (SOAS) 517 Grand Ave. Ardmore, OK 73401	Ms. Quinlan is expected to testify at trial consistent with her deposition testimony.
26.	Stephanie Phillips Southern Oklahoma Ambulance Service (SOAS) 517 Grand Ave. Ardmore, OK 73401	Ms. Phillips is expected to testify at trial consistent with her deposition testimony.
27.	Johnny Denney c/o Loren Gibson	Mr. Denney was an employee or agent of the Carter County Sheriff's Office. On November 3, 2015, Mr. Denney signed a refusal of treatment and transport, purportedly

	<p>Gibson & Associates, PLC 105 N. Hudson, Ste 312 Oklahoma City, Oklahoma 73102</p> <p>Or</p> <p>1618 MOUNT WASHINGTON RD, ARDMORE, OK 73401</p>	<p>on behalf of Mr. Manos. Mr. Denney would be expected to testify concerning the events of November 3, 2015, as well as any other information he has concerning Mr. Manos and the practices, policies and customs of the Carter County Sheriff's Office.</p>
28.	<p>Kimberlee Miller c/o Ambre C. Gooch Collins Zorn & Wagner, PC 429 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815 Phone: (405) 524-2070</p>	<p>Nurse at the Carter County Jail. Would be expected to testify concerning any information she has concerning Mr. Manos and the practices, policies and customs of the Carter County Sheriff's Office.</p>
29.	<p>Michael Armstrong c/o Ambre C. Gooch Collins Zorn & Wagner, PC 429 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815 Phone: (405) 524-2070</p>	<p>Jail Administrator. Would be expected to testify concerning any information he has concerning Mr. Manos and the practices, policies and customs of the Carter County Sheriff's Office.</p>
30.	<p>Ralph Baumstark 159 SEMINOLE RD # OK, LONE GROVE, OK 73443</p>	<p>Former Carter County inmate. Would be expected to testify concerning his observations of Mr. Manos and the practices, policies and customs of the Carter County Sheriff's Office.</p>
31.	<p>Darian Nikole Hinkle-King 1477 SANDY CREEK RD ARDMORE, OK 73401</p>	<p>Deputy at Carter County Jail. Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Jail. Treatment and care provided to Mr. Manos in the Jail.</p>
32.	<p>Jarrold Steven Smith 40 DUECE LN POOLEVILLE, OK 73401</p>	<p>Former Carter County inmate. Would be expected to testify concerning his observations of Mr. Manos and the practices, policies and customs of the Carter County Sheriff's Office.</p>
33.	<p>Paul Johnson c/o Ambre C. Gooch Collins Zorn & Wagner, PC 429 N.E. 50th Street, 2nd Floor Oklahoma City, OK 73105-1815 Phone: (405) 524-2070</p>	<p>Deputy at Carter County Jail. Facts and circumstances relevant to allegations contained in the Complaint. Policies, procedures, and practices in place at the Jail. Treatment and care provided to Mr. Manos in the Jail.</p>

34.	Drake Michael Wright 1757 BUCKHORN RD FOX, OK 73435 Or 97 CHEROKEE ST HEALDTON, OK 73438	Former Carter County inmate. Would be expected to testify concerning his observations of Mr. Manos and the practices, policies and customs of the Carter County Sheriff's Office.
35.	CHARLINE M BEENE 105 E TUMBLEWEED LN DAVIS, OK 73030-9607	Former Carter County Deputy. Would be expected to testify concerning the policies, practices and customs of the CCSO under Milton Anthony.
36.	Kelli Denney c/o Loren Gibson Gibson & Associates, PLC 105 N. Hudson, Ste 312 Oklahoma City, Oklahoma 73102 Or 1618 MOUNT WASHINGTON RD ARDMORE, OK 73401	Former Carter County Deputy. Would be expected to testify concerning the policies, practices and customs of the CCSO under Milton Anthony.
37.	KEN GRACE 811 N ROCKFORD PL ARDMORE, OK 73401	Former Carter County Sheriff. Would be expected to testify concerning the historic policies, practices and customs of the CCSO.

Plaintiff reserves the right to supplement this witness list. Plaintiff also reserves the right to call witnesses for impeachment and/or rebuttal purposes.

Plaintiff further reserves the right to call witnesses endorsed by Defendants to which Plaintiff does not object.

Plaintiff reserves the right to call any witness needed to authenticate documents, to the extent necessary.

Respectfully submitted,

SMOLEN, SMOLEN & ROYTMAN, PLLC

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CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of May 2018, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all ECF registrants who have appeared in this case.

/s/ Robert M. Blakemore